

Document - Definition

- Written Instructions on How the EMS Was Developed and How It Will Continue to Be Implemented
- Documents May Be Required by Environmental Regulation
- Example Documents
 - Environmental Policy Statement
 - Communication Procedure
 - Spill Response Plan
 - Compliance Manual



Documents

- Develop EMS Procedures Needed to Demonstrate Compliance with 10 Elements of the EMS
- Key Things to Consider
 - Identify Who Needs the Document
 - Identify Places Where Lack of Consistency in Performing a Task Would Lead to an Environmental Problem or Deviation of the EMS
 - Importance of Remembering How the EMS Element Was Developed and Implemented

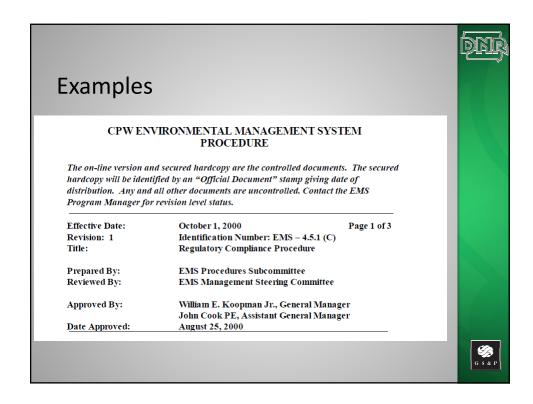


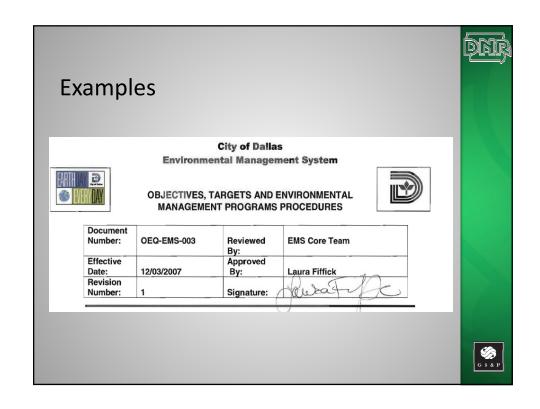


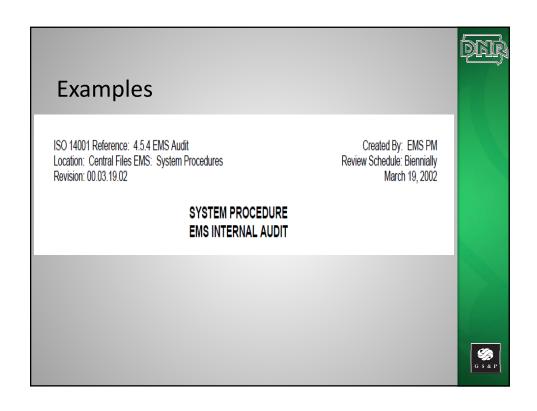


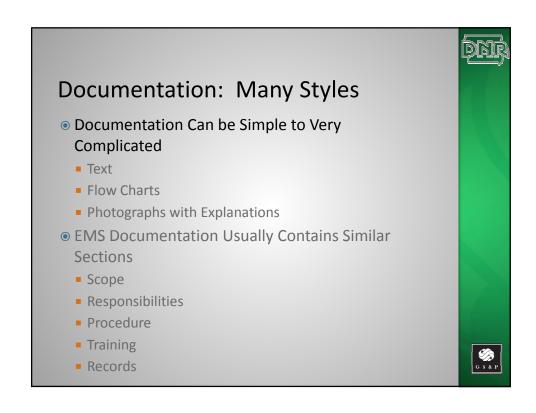
Document "Control" Document Control is Having a Review and Approval Process for Finalizing Documents Document Numbering Systems Can Also Be Part of Document Control Primary Method Used to Ensure a Procedure or Process is Approved Staff is Working From the Latest Document











What Makes Sense?

- A Document Format that Works Best for Your Organization
- User-focused
- Communicates the Necessary Information
- Developed by or With Users
- Reviewed and Updated Routinely
- Many Formats are Possible
- Consistency



List of Documentation Requirements

- Environmental Policy
- Impact List (with Significant Impacts)
- Legal Requirements List
- Objectives and Targets List with Action Plans and Key Resources/Additional Needs



Required Procedures

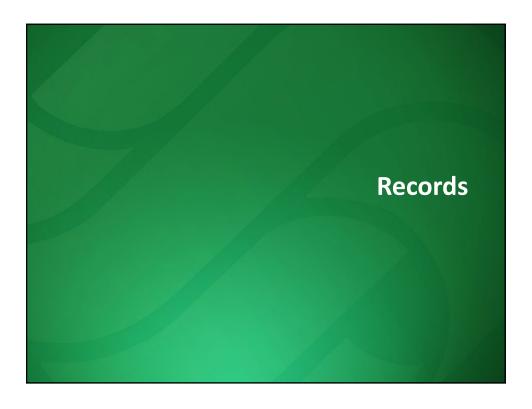
- Communication/Training/Awareness Procedure
- Monitoring and Measurement Procedure
- Assessment Procedure
- Reevaluation and Modification Procedure



Consider the Use of an EMS Manual

- An EMS Manual is Used to Tell "Our EMS Story" and May Also Be Used to Keep all EMS and Compliance Documentation in One Place
- Describes and Defines the Entire EMS Process in One Location and Answers the W questions-- who, where, when, what, why





Record - Definition

- Proof or Evidence that the EMS or Compliance Program is in Place and Functioning
- Most Records Cannot or Should Not Be Changed
- Example Records
 - Completed Training Log
 - Completed Inspection Checklist
 - Manifests





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Record Name	Review	Facility	Storage	Final Retention
	Frequency	Retention	Location	
Manifest		4 years	Environmental files in Building	Dallas Municipal Archives and Records Center
Notice of Registration	Annually	4 years	Environmental files in Building #1	Dallas Municipal Archives and Records Center
Audit Records		3 years after Consent Decree	Environmental files in Building #1	
Environmental daily/weekly checklist	Annually	4 years	Filing cabinet in shop store.	
Environmental Training sign in sheets		3 years after Consent Decree	Departmental Training files	Dallas Municipal Archives and Records Center
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Records - Things to Consider

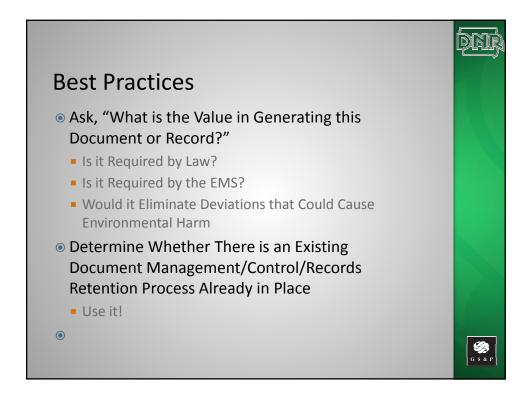
- Records That Are Required to Demonstrate
 Compliance with the Law
- Most Organizations Have a Records Retention or Retrieval Process Already in Place

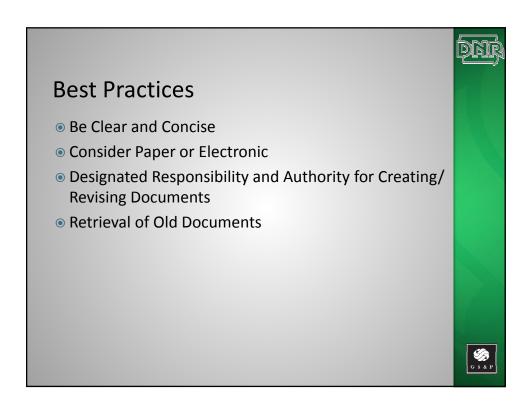


Records Required for the EMS

- Record of Objectives and Targets Status
- Updated Legal and Other Requirements List
- Log of Information Requests from the Public with Corresponding Responses
- Records of Metrics Data
- Memo of Reevaluation Results with Proposed Modifications







Over Documentation Problems

- Keeping Up With It!
- If I Say I'm Going to Do It in a Written Procedure,
 Then I Better Be Doing It
- If the EMS Becomes About Generating Paperwork,
 Then We Missed the Point



Documentation Deliverables (HF 2570)

- Environmental Policy
- Impacts List
- Objectives and Targets List
- Legal and Other Requirements List
- Communication Procedure
- Monitoring Procedure
- Assessment Procedure
- Record of Reevaluation Results and Proposed Modifications
- Annual Compliance Report



Documents vs. Records Review

Documents

- Offer guidance or explain actions to be carried out
- Policies or direction from Management
- Can be changed
- Example: A blank Audit Checklist form

Records

- Provide verification that things have happened
- Data to demonstrate reaching Targets
- Cannot be changed
- <u>Example</u>: A completed Audit Checklist



Documents vs. Records (cont.)

Documents examples:

- Environmental policy
- Internal standards
- Operating procedures
- Process information
- Organizational charts
- Emergency plans

Records examples:

- Training reports
- Incident reports
- Waste diversion data
- Product information
- Complaints and responses
- Audit findings
- Management review
- Meeting minutes





